

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)	
	)	
v.	)	CRIMINAL NO. 15-MJ-06087-MPK
	)	
SHANE GUNN	)	

**JOINT MOTION TO CONTINUE PROBABLE CAUSE HEARING**

Defendant, Shane Gunn, and the United States Government by and through their respective attorneys hereby move that the probable cause hearing, now scheduled for September 11, 2015, be continued to October 16, 2015 or to another date thereafter convenient to the Court. As reason for this request, the parties state that they have engaged in negotiation concerning the disposition of this matter, possibly by way of information, and require additional time to complete negotiations. The defendant consents to this continuation pursuant to Fed. R. Crim. P. 5.1(c) & (d), and the parties agree that the period of time commencing on September 11, 2015 and concluding on the next scheduled date for probable cause hearing is excludable under the Speedy Trial Act.

WHEREFORE, the parties respectfully submit that good cause exists to continue this matter and request that this Court continue the probable cause hearing to October 16, 2015 or a date thereafter convenient to the Court.

SHANE GUNN

By His Attorney,

/s/ Timothy Watkins  
Timothy G. Watkins  
Federal Defender Office  
51 Sleeper St., Fifth Floor  
Boston, MA 02210  
Tel: 617-223-8061

CERTIFICATE OF SERVICE

I, Timothy G. Watkins, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on September 9, 2015.

/s/ Timothy G. Watkins  
Timothy G. Watkins